

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN THE MATTER OF:

STAYMOBILE VENTURE LLC

Chapter 7  
Case No. 22-43781-lsg  
Hon. Lisa S. Gretchko

Debtor(s)

---

**STIPULATION TO ENTRY OF ORDER APPROVING  
OSIPOV BIGELMAN, P.C.'s FEE APPLICATION  
IN ACCORDANCE WITH SALE ORDER AUTHORIZING  
SECTION 506 SURCHARGE FOR COMPENSATION  
FOR SERVICES RENDERED AS ATTORNEYS FOR TRUSTEE**

Timothy J. Miller, the Chapter 7 Trustee of the bankruptcy estate of Staymobile Venture LLC (the "Trustee"), and Brian M. Eisenberg, Kenneth A. Eisenberg, and Stephen A. Eisenberg (collectively, the "Eisenbergs"), by and through their undersigned counsel, hereby Stipulate to Entry of Order Approving Osipov Bigelman, P.C.'s Fee Application in Accordance with Sale Order Authorizing Section 506 Surcharge for Compensation for Services Rendered as Attorneys for Trustee, and request that this Court enter the proposed order attached hereto as **Exhibit A**.

Respectfully Submitted,

**OSIPOV BIGELMAN, P.C.**

**HONIGMAN LLP**

/s/ Jeffrey H. Bigelman  
DAVID P. MILLER (P79911)  
JEFFREY H. BIGELMAN (P61755)  
Attorneys for Trustee  
20700 Civic Center Drive  
Suite 420  
Southfield, MI 48076  
Tel: (248) 663-1800  
[dm@osbig.com](mailto:dm@osbig.com)  
[jhb@osbig.com](mailto:jhb@osbig.com)

/s/ E. Todd Sable (with Consent)  
E. TODD SABLE (P54956)  
SCOTT B. KITEI (P78064)  
Attorneys for the Eisenbergs  
2290 First National Building  
660 Woodward Avenue  
Detroit, MI 48226  
Tel: (313) 465-7000  
[tsable@honigman.com](mailto:tsable@honigman.com)  
[skitei@honigman.com](mailto:skitei@honigman.com)

Dated: March 17, 2023

Dated: March 17, 2023

**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN THE MATTER OF:

STAYMOBILE VENTURE LLC

Chapter 7  
Case No. 22-43781-lsg  
Hon. Lisa S. Gretchko

Debtor(s)

\_\_\_\_\_  
/ *[proposed]*

**ORDER APPROVING  
OSIPOV BIGELMAN, P.C.'s FEE APPLICATION  
IN ACCORDANCE WITH SALE ORDER AUTHORIZING  
SECTION 506 SURCHARGE FOR COMPENSATION  
FOR SERVICES RENDERED AS ATTORNEYS FOR TRUSTEE**

This matter came before the Court upon OSIPOV BIGELMAN, P.C.'s Fee Application in Accordance with Sale Order Authorizing Section 506 Surcharge for Compensation for Services Rendered as Attorneys for Trustee May 10, 2022 through November 30, 2022 ("Application"; ECF No. 313). All interested parties were served with notice of the Application and the provisions E.D. Mich. LBR 2016-1 were met. Brian M. Eisenberg, Kenneth A. Eisenberg, and Stephen A. Eisenberg (collectively, the "Eisenbergs") filed an objection to the Application ("Objection"; ECF No. 323). No other objections were filed. On March 17, 2023, the Court held a hearing on the Application. The Eisenbergs withdrew their objection at the Hearing. The Court has reviewed the Application and other pertinent pleadings, has considered the statements made at the Hearing, and is sufficiently advised in the premises.

NOW, THEREFORE, IT IS HEREBY ORDERED that the Application is granted as set forth in this Order and the firm of OSIPOV BIGELMAN, P.C., counsel for Chapter 7 Trustee, Timothy J. Miller, Esq., is awarded fees and expenses in the amount of:

**Sale Order Fees and Expenses:**

<b>A.</b>	<b>Total Fees</b>	<b>\$60,656.50<sup>1</sup></b>
	<b>Total Expenses</b>	<b>\$11,160.91</b>
	<b>Total Awarded</b>	<b>\$71,817.41</b>

for services from May 10, 2022 through November 30, 2022.

---

<sup>1</sup> The Court deducted \$150.00 in fees that it determined were clerical in nature.